



ATOFINA Chemicals, Inc.

The Honorable David Garman, Assistant Secretary  
Office of Energy Efficiency & Renewable Energy  
U.S. Department of Energy  
1000 Independence Ave. SW  
Washington, DC 20585  
FAX: (202) 586-5954

March 26, 2003

Dear Mr. Garman:

**Re: ENERGY STAR Windows Criteria Proposed Changes**

I am writing to voice my concern regarding the proposed changes for the ENERGY STAR Criteria for windows. In your latest proposal (February 11, 2003), the Department of Energy provides an overview of both a 4-zone and 3-zone map for the criteria for windows being awarded the ENERGY STAR label. In this proposal, you appear to favor the 3-zone, despite the fact that the 4-zone will provide greater energy savings.

I believe that the ENERGY STAR Windows program provides a great service to the American consumer. For example, I built a new home several years ago, which was the first time I became aware of the different technologies that provide energy efficiency for windows and doors. This was also the first time I became aware of the lack of understanding of the differences in various options, even by those selling these products (window manufacturers). A taxpayer funded program like ENERGY STAR provides a simple way to help educate consumers and provides a simple differentiation of products **BASED ON ENERGY SAVING PERFORMANCE**. As a consumer, this is both my interest and expectation of what an ENERGY STAR label should represent. Factors such as peak (cooling) energy demand, and the DoE stated interest to simplify the criteria for the benefit of window manufacturers should be subordinate to the key criteria of ENERGY SAVINGS. It is incomprehensible to me that the U.S. Department of Energy would advocate criteria to be established that would misrepresent the value of the ENERGY STAR label to American consumers.

As an employee of a company that has invested, and continues to invest, in technology such as pyrolytic coatings for windows which impart Low-E properties, I am further concerned that altering ENERGY STAR criteria to discourage use of the optimum technology for certain regions of the country is inconsistent with the stated goals of the ENERGY STAR PROGRAM.

For the above reasons, I appeal to you to employ this program to do that which is best for this country's energy requirements and for the taxpayers who are funding this initiative. **The 4-zone alternative should be implemented.**

- ▶ First, the 4-zone proposal saves more energy than the 3-zone proposal as evidenced by your own supporting documentation.
- ▶ Second, your support for the 3-zone option is primarily based upon concern with summer peak energy savings. As I trust you know, there is currently a substantial reserve margin in the peak energy market, and this reserve margin is projected to nearly double in the next several years. Contrast this to the crisis we face TODAY due to a cold winter and the impact of escalating oil prices.

- ▶ The 3-zone is the exact same proposal your agency was compelled to withdraw last year after numerous objections were raised by Members of Congress and stakeholders in the program. Conversely, the map of the 4-zone proposal outlines the substantial climate analysis conducted by DoE and puts that understanding into practice.
- ▶ The 3-zone proposal will create a monopoly in the marketplace by eliminating the use of pyrolytic Low-E glass. The elimination of a viable technology will reduce customer's choice on energy efficient products and increase consumers home heating costs. As I understand it, the Department of Energy prides itself on assisting industry in developing technology with *improved performance*. How can you justify elimination of a technology that has both improved performance and improved cost?

On this basis, DoE's proposed 3-zone criteria should **not** be adopted. The Department of Energy, Office of Energy Efficiency and Renewable Energy, **should adopt the 4-zone alternative proposal**. This proposal, based on scientific analysis, will save more overall energy, maintains competition in the marketplace, allows for lower home heating costs for consumers, and will maintain within this industry a competitive environment to seek improvements in energy efficient technology. I believe this change should be implemented and in the end, the real winner will be the window industry, DoE, consumers and our country.

Let me thank you in advance for ensuring that the right decision will be made on this very beneficial program.

Sincerely,

A handwritten signature in black ink, appearing to read 'JR', with a long horizontal line extending to the right.

Jay R. Reyher  
General Manager, Coatings and Epoxides

cc: Congressman Chaka Fattah Fax: (202) 225-5392  
Senator Rick Santorum E-mail: <http://santorum.senate.gov/emailrjs.html>  
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